

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Kane, et al.

Plaintiffs,

vs.

De Blasio, et al.

Defendants.

DECLARATION OF
AMANDA RUIZ

Civil Action No. 1:21-cv-07863

STATE OF NEW YORK)
) ss.:
COUNTY OF BRONX)

Amanda Ruiz, declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true:

1. I am public school teacher who works with plaintiff Trinidad Smith.
2. I have been teaching children with special needs for the Department of Education for 10 years.
3. Our school is a special needs school. All of the children in the school are classified as special needs or emotionally disturbed.
4. On October 4, 2021, the NYC DOE began excluding any unvaccinated staff, including, upon information and belief, Trinidad Smith.
5. This has had a big impact on our ability to keep the children safe and make sure that they are being educated.
6. Because many bus drivers were no longer able to work starting last Monday, many children did not arrive to school until 11am or 12pm.
7. Because we had no nurse starting last Monday, the children could not receive their medication in the morning.

8. Many of these children require medication to stay safe and to keep others safe.
9. Due to the lack of medication, three children had to be sent to the ER last week.
10. Because of staffing issues in the cafeteria, the children are also deprived of hot lunches. They have been eating meals like freezer burned frozen pancakes.
11. In addition to missing Trinidad, we are also missing a number of other paras, aids and teachers.
12. Some replacements were sent, but they do not have the same training or experience. With these children, relationships are crucial, as is experience.
13. The children are not provided with necessary services or structured learning that they need. It is my opinion that the decision to terminate so many teachers and staff last week is taking a toll on these vulnerable children.
14. I am worried for their safety and for their well-being.

A handwritten signature in black ink, reading "Amanda Ruiz", written over a horizontal line.

Amanda Ruiz